

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT  
THERAPY PRODUCTS LIABILITY  
LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

This document applies to:

All Cases in Which AbbVie is a  
Defendant

**PLAINTIFFS' EXECUTIVE COMMITTEE'S MOTION TO COMPEL PRODUCTION OF  
DOCUMENTS PERTAINING TO THE SAFETY OF EXOGENOUS TESTOSTERONE**

The Plaintiffs' Executive Committee hereby moves, pursuant to Rules 26 and 37 of Federal Rules of Civil Procedure for an order compelling Defendants AbbVie Inc. and Abbott Laboratories (collectively, "AbbVie") to: (1) produce any documents uncovered by its ESI search pertaining to the safety of testosterone or testosterone-containing products that contain information relating solely to other, "non-commercialized" testosterone products; and (2) search ESI for, and produce, data pertaining to risks and safety from clinical trials conducted to study other "non-commercialized" TRT products.

The grounds for this Motion are set forth in the Plaintiffs' Executive Committee Memorandum in Support of Motion to Compel Production of Documents Pertaining to the Safety of Endogenous Testosterone, filed contemporaneously herewith.

Dated: June 26, 2015

Respectfully submitted,

/s/ Trent B. Miracle

Trent B. Miracle

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Plaintiffs' Co-Lead Counsel

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of this Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Trent B. Miracle

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